

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA)
)
)
v.) Criminal No.: 3:22-CR-00001
)
)
MARKEL MORTON)
)

STATEMENT OF FACTS

The parties stipulate that the allegations contained in the First Superseding Indictment and the following facts are true and correct, and that had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt.

Markel Corevis MORTON, also known as “Kel” or “Mafia,” recruited Adrian “A-1” ANDERSON and Corey KINNEY to rob a local drug dealer. Quincy “Boosie” BROCK,¹ also agreed to participate in the robbery. MORTON promised his co-conspirators that there would be approximately \$50,000 in cash from drug proceeds concealed at a location believed to be one of the drug dealer’s stash houses. In furtherance of this plan, on or around August 19 and August 20, 2021, MORTON and others conducted surveillance of the location believed to be the drug dealer’s “stash house,” which was an apartment rented by S.H.D., located in the Treedsdale Apartments complex in Albemarle County. Albemarle County is in the Western District of Virginia. Security video footage and locational data from MORTON’s GPS monitoring ankle bracelet place him at the Treedsdale Apartment complex at various times on August 19 and August 20, 2021 conducting this surveillance in different vehicles. Texts messages also show MORTON, ANDERSON, and BROCK discussing the planned robbery. MORTON’s GPS monitoring ankle bracelet also show him driving through the Prospect Avenue neighborhood on August 20, 2021, where he was conducting surveillance on the residence of the drug dealer’s mother, O.B. Prospect Avenue is located in Charlottesville, which is located in the Western District of Virginia.

On August 20, 2021, at approximately 8:50 p.m., BROCK, ANDERSON, and KINNEY forced entry in the apartment of S.H.D., as was planned with MORTON. S.H.D. believes it was KINNEY who held her at gunpoint, while BROCK took her keys and searched her vehicle and ANDERSON searched her apartment. During the robbery, BROCK, ANDERSON, and KINNEY took S.H.D.’s cellphone and other items from her apartment. All were armed with a firearm.

BROCK, ANDERSON, and KINNEY returned to MORTON’s location in Albemarle

¹ MORTON also calls BROCK by the alias “Chain.”

Defendant's Initials: m m

County, where MORTON then suggested that they attempt to locate the drug dealer's stash at his mother's residence on Prospect Avenue. Security video footage then shows MORTON, ANDERSON, BROCK, and KINNEY leaving their planning location and getting in a vehicle being driven by MORTON a few minutes after 9:00 p.m. on August 20, 2021. All four men were armed with firearms. All four men then traveled to Prospect Avenue, where BROCK and MORTON entered O.B.'s apartment and stole a safe containing approximately \$50,000 belonging to the drug dealer. As they fled O.B.'s apartment, either BROCK or MORTON pointed their firearm at J.H., who was standing outside of the apartment. BROCK and MORTON then fled out the back of the apartment building. MORTON's GPS monitoring ankle bracelet shows MORTON at the location of the robbery on Prospect Avenue at the time of the robbery.

On January 12, 2022, MORTON instructed J.M. not to answer questions from law enforcement about the robberies and to lie about why he was seen on video at the Treedsdale Apartment complex before the first robbery on August 20, 2021.

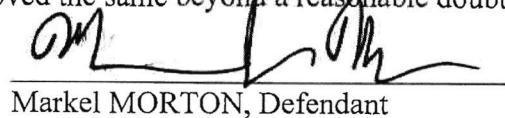
The actions taken by MORTON as described above were taken willfully, knowingly, and with the specific intent to violate the law. MORTON did not take those actions by accident, mistake, or with the belief that they did not violate the law. MORTON acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity.

Respectfully submitted,



Heather L. Carlton
Assistant United States Attorney

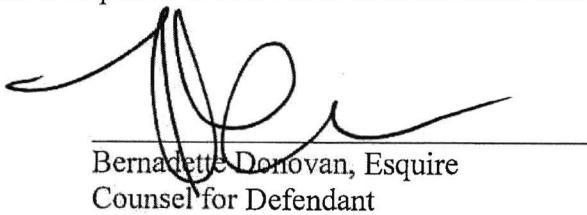
After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Markel MORTON, Defendant

Defendant's Initials: mjm

I am Markel MORTON's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Bernadette Donovan, Esquire
Counsel for Defendant

Defendant's Initials: MM